Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 1 of 19

Exhibit A

Cornerstone Report - SEC Cryptocurrency Enforcement Actions

	Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
1.	No. 4:13-CV-416 (E.D. Tex. Aug. 6, 2013)	Defendant operated a Ponzi scheme that defrauded investors out of more than 700,000 bitcoins. https://www.justsecurity.org/wp- content/uploads/2014/04/SEC.Complaint.SEC-v- Shavers.2013.pdf	Yes	No	Yes
2.	Vorhees, File No. 3- 15902 (June 3, 2014)	Defendant offered unregistered securities in two entities, and received payment in bitcoins. https://www.sec.gov/litigation/admin/2014/33-9592.pdf	Yes	No	Yes
3.	Trading, Corp. and Ethan Burnside, File No. 3-16307 (Dec. 8, 2014)	offered shares in unregistered securities in exchange	Yes	No	Yes
4.	Hill Exchange, File No. 3-16598 (June 17, 2015)	Defendant offered unregistered securities-based swaps that allowed customers to bet on the value of public companies in transactions denominated in digital assets. https://www.sec.gov/litigation/admin/2015/33-9809.pdf	No	No	Yes

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 2 of 19

	Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
5.	al., Case No. CV 15-07425 (C.D. Cal. September 22, 2015)	Defendant operated a pyramid scheme that falsely promised investors they would profit from amber mines, and provided payment in a virtual currency secured by the company's nonexistent amber assets. https://www.sec.gov/litigation/complaints/2015/comp-pr2015-227.pdf	Yes	No	Yes
6.	Garza, Case No. 3:15-cv-01760 (D. Conn. Dec. 1, 2015)	Defendant operated a Ponzi scheme that offered shares in a cryptocurrency mining venture, and made false statements about the computer power that would be available for mining. https://www.sec.gov/litigation/complaints/2015/comp2 3415.pdf	Yes	No	Yes
7.	Investment Trust and Secondmarket, File No. 3-17335 (July 11, 2016)	Defendant violated Rule 101 restricting distribution participants from purchasing securities that were subject to a distribution; the securities were in entities that invested in cryptocurrencies. https://www.sec.gov/litigation/admin/2016/34-78282.pdf	No	No	Yes
8.	Haddow, et al., Case No. 17-cv-4950 (S.D.N.Y. June 30, 2017)	Defendant made false claims to investors in "Bitcoin Store Inc.," which the defendant claimed provided cryptocurrency services but did not have any operations or revenue. https://www.sec.gov/litigation/complaints/2017/comp-pr2017-123.pdf	No	No	Yes

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 3 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
9. SEC v. ReCoin and DRC World Inc., Case No. 17-cv-05725 (E.D.N.Y. Sep. 29, 2017)	purportedly backed by investments in real estate and	Yes	Yes	No
Case No. 17-cv-07007	Defendant attempted to defraud investors in an ICO by claiming investments would yield a 1,354 percent profit in less than a month. https://www.sec.gov/litigation/complaints/2018/comp24079.pdf		Yes	No
Munchee Inc., File No.	Defendant created an app for restaurant reviews, and sold digital tokens to raise capital that would support its restaurant review platform and claimed the tokens would increase in value. https://www.sec.gov/litigation/admin/2017/33-10445.pdf	Yes	Yes	No
12. SEC v. AriseBank et al., Case No. 3:18-cv- 00186-M (N.D. Tex. Dec. 11, 2018)	Defendants falsely claimed to have created an FDIC-insured bank for cryptocurrency transactions, and funded their efforts with a fraudulent ICO. https://www.sec.gov/litigation/complaints/2018/finaljudgment-pr2018-280.pdf	Yes	Yes	No

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 4 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
	Defendants operated an unregistered online securities exchange and defrauded exchange users by misappropriating their bitcoins and failing to disclose a cyberattack on the exchange's system that resulted in the theft of more than 6,000 bitcoins. https://www.sec.gov/litigation/complaints/2018/comp24078.pdf	No	No	Yes
14. SEC v. Sohrab Sharma, et al. Case No. 18-cv- 02909 (S.D.N.Y. Apr. 2, 2018)	claimed to offer a cryptocurrency debit card backed by	Yes	Yes	No
<i>al</i> , Case No. 18-cv-2977	Defendants conducted unregistered distributions of Longfin Corp. securities, which had also been inflated by purchase of a purported cryptocurrency company. https://www.sec.gov/litigation/complaints/2019/comp-pr2019-90-1.pdf	No	No	Yes
16. SEC v. Titanium Blockchain Infrastructure Services, Inc., et al., Case No. 2:18-CV-04315-DSF (JPRx) (C.D. Cal. May 22, 2018)	Defendants orchestrated a fraudulent ICO that solicited investors by comparing purchase of the tokens to an investment in "Intel or Google," and falsely claimed relationships with the Federal Reserve and dozens of well-known firms as partners. https://www.sec.gov/litigation/litreleases/2018/lr24160.htm	Yes	Yes	No

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 5 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
and Mark F. DeStefano,	Defendants unlawfully sold restricted shares of a blockchain-related business during an unusual price spike. https://www.sec.gov/litigation/litreleases/2018/lr24190.htm	Yes	No	Yes
18. In the Matter of Tomahawk Exploration, File No. 3-18641 (Aug. 14, 2018)	Defendants conducted a fraudulent ICO to fund purported oil drilling, and distributed tokens in exchange for online promotional activity. https://www.sec.gov/news/press-release/2018-152	Yes	Yes	No
19. SEC v. James Bernard Moore et al, Case No. 18-cv-07803 (S.D.N.Y. Aug. 27, 2018)	Defendant, a co-conspirator of Ponzi scheme perpetrator Renwick Haddow, aided and abetted fraud. This case does not directly involve cryptocurrency at all, although co-conspirator Haddow's schemes involved a fraudulent cryptocurrency business. https://www.morrisoncohen.com/siteFiles/files/2018_08_27%20- %20SEC%20v_%20Moore,%20et%20al.pdf	No	No	Yes
20. In The Matter of Crypto Asset Management, et al, File No. 3-18740 (Sept. 11, 2018)	Defendant operated an unregistered investment company that falsely marketed itself as the "first regulated crypto asset fund in the United States." https://www.sec.gov/news/press-release/2018-186	Yes	No	Yes

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 6 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
TokenLot LLC, et al, File No. 3-18739 (Sept.	Defendant acted as unregistered broker-dealer by operating a self-described "ICO Superstore" and promoting digital tokens on behalf of issuers. https://www.sec.gov/news/press-release/2018-185	Yes	No	Yes
Case No. 18-cv-02244 (D.D.C. Sept. 27, 2018)	Defendants unlawfully offered and sold unregistered swap contracts to investors, which allowed investors to buy swaps tracking the value of stocks, commodities, foreign-exchange pairs, and cryptocurrencies. https://www.sec.gov/litigation/complaints/2018/comp24330.pdf		No	Yes
(MSB) (S.D. Cal. Oct. 3, 2018)	Defendants planned to raise funds through an ICO for several financial products that would generate passive income and double-digit returns based on misrepresentations about the firm's regulatory status. https://www.sec.gov/litigation/litreleases/2019/lr24400.htm		Yes	No
	Defendant operated an unregistered securities exchange using the Ethereum blockchain. https://www.sec.gov/news/press-release/2018-258	No	No	Yes

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 7 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
CarrierEQ (AirFox), File No. 3-18898 (Nov.	Defendant offered an ICO to fund a prepaid mobile phone business, and made statements that the tokens would increase in value as a result of the defendant's efforts. https://www.sec.gov/litigation/admin/2018/33-10575.pdf	Yes	Yes	No
	technology and legalization advocacy in the cannabis	Yes	Yes	No
Mayweather Jr., File	Defendant used celebrity status to promote an ICO and tokens (Centra Tech) without disclosing personal compensation. https://www.sec.gov/news/press-release/2018-268	No	No	Yes
	Defendant used celebrity status to promote an ICO and tokens (Centra Tech) without disclosing personal compensation. https://www.sec.gov/news/press-release/2018-268	No	No	Yes
29. In The Matter of CoinAlpha Advisors, File No. 3-18913 (Dec. 7, 2018)	Defendant failed to file register securities offering for entity formed to invest in digital assets. https://www.sec.gov/litigation/admin/2018/33-10582.pdf	Yes	No	Yes

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 8 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
Network, File No. 3-	Defendant conducted an ICO to finance a cybersecurity business. https://www.sec.gov/news/press-release/2019-15	Yes	Yes	No
31. SEC v. Natural Diamonds Investment Co, et al, Case No. 9:19- cv-80633-RLR (S. D. Fla. May 13, 2019)	promising investments backed by diamonds and	Yes	Yes	No
32. In The Matter of NextBlock Global, File No. 3-19164 (May 14, 2019)	Defendant made false statements in connection with fundraising for a blockchain company. https://www.sec.gov/litigation/admin/2019/33-10638.pdf	No	No	Yes
et al., Case No. 5:19-	Defendant operated a pyramid scheme where participants could opt to receive rewards in the form of cryptocurrency tokens. https://www.sec.gov/litigation/litreleases/2019/lr24478 htm	Yes	No	Yes
	Defendant, a co-conspirator of Ponzi scheme perpetrator Renwick Haddow, aided and abetted fraud. This case does not directly involve cryptocurrency; co-conspirator Haddow's schemes involved a fraudulent cryptocurrency business. https://www.sec.gov/litigation/complaints/2019/comp24479.pdf	No	No	Yes

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 9 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
35. SEC v. Kik, Case No. 19-cv-05244 (S.D.N.Y. June 4, 2019)	Defendant offered and sold digital tokens and Simple Agreements for Future Tokens ("SAFTs") through an unregistered ICO. https://www.sec.gov/news/press-release/2020-262	Yes	Yes	No
al., Case No. 19-cv- 05296 (S.D.N.Y. June 5, 2019)	Defendants engaged in fraudulent public offering in a scheme to obtain a listing on the Nasdaq Stock Market, LLC ("NASDAQ"). After misrepresenting its status as a company based in the United States to use SEC Regulation A to proceed with an offering, defendants distributed over 400,000 shares to insiders and affiliates of the company to create the false appearance of a public float of bona fide investors to satisfy the NASDAQ listing requirements. https://www.sec.gov/divisions/enforce/claims/docs/complaint-longfin-060519.pdf	No	No	Yes
	Defendant offered and sold unregistered digital tokens and SAFTs through ICO pools. https://www.sec.gov/litigation/admin/2019/33- 10671.pdf	Yes	Yes	No
Middleton, Case No. 19-	Defendants defrauded investors in ICO offering of virtual currency by making misrepresentations about the potential profitability and viability of the company's operations, as well as its use and amount of funds, and by manipulating the price and volume of the virtual currency on secondary markets. https://www.sec.gov/litigation/litreleases/2019/lr24665.htm		Yes	No

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 10 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
Rating, File No. 3-19366 (Aug. 20, 2019)	Defendant violated Section 17(b) of the Securities Act by assigning ratings to various ICOs without disclosing that it charged fees of the ICOs to provide such ratings. https://www.sec.gov/litigation/admin/2019/33-10673.pdf	No	No	Yes
al., Case No. 19-cv-2059 (N.D. TX. Aug. 29, 2019)	Defendant defrauded investors by offering digital tokens it falsely claimed provided fractional shares of the company's stock or an interest in a cryptocurrency mining facility that did not exist. Defendants also illegally operated an unregistered exchange that offered one of its digital tokens. https://www.sec.gov/litigation/litreleases/2019/lr24582.htm	Yes	Yes	No
· ·	Defendant failed to file periodic reports as required by Exchange Act Section 13(a) and Rules 13a-1 and 13-a-13 thereunder. https://www.sec.gov/litigation/admin/2019/34-87242.pdf		No	Yes
	Defendant offered and sold its digital tokens through an unregistered ICO and engaged in unregistered broker activities by facilitating ICOs for dozens of clients. https://www.sec.gov/litigation/litreleases/2020/lr24763.htm	Yes	Yes	No

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 11 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
Case. No. 24607 (S.D.N.Y. Sept. 20, 2019)	Defendant defrauded investors in an unregistered ICO of digital tokens he falsely claimed would value through trading on a purported online adult entertainment marketplace that did not exist. Defendant's misrepresentations included a false claim that a "working beta" of the site existed, a presentation of a fictitious management team, and false claims about his own experience. https://www.sec.gov/litigation/litreleases/2019/lr24607.htm	Yes	Yes	No
44. In the Matter of Block.one, File No. 3- 19568 (Sept. 30, 2019)	Defendant offered and sold unregistered digital tokens through an ICO. https://www.sec.gov/litigation/admin/2019/33-10714.pdf	Yes	Yes	No
Nehulus, Inc., File No.	Defendant engaged in unregistered offering and sale of securities. https://www.sec.gov/litigation/admin/2019/33- 10715.pdf	Yes	No	Yes
No. 19-cv-9439 (Oct. 11, 2019)	Defendant offered and sold unregistered digital tokens and Simple Agreements for Future Tokens ("SAFTs") through an ICO. https://www.sec.gov/litigation/complaints/2019/comp-pr2019-212.pdf	Yes	Yes	No

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 12 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
•	Defendant that advertised itself as "the world's first professional investment service that bridges the gap between cryptocurrencies and global stock markets" offered and sold security-based swaps online without registering the securities or registering as an exchange. https://www.sec.gov/litigation/admin/2019/33-10723.pdf	Yes	No	Yes
	Defendants fraudulently raised \$42.5 million worth of virtual currency through an unregistered ICO of digital tokens based on a series of false and misleading statements to potential and actual investors, including misrepresentations about the purported successful pilots of the token's application. https://www.sec.gov/litigation/litreleases/2020/lr24842.htm		Yes	No
49. In the Matter of Blockchain of Things, File No. 3-19621 (Dec. 18, 2019)	Defendant offered and sold unregistered digital tokens through an ICO. https://www.sec.gov/litigation/admin/2019/33-10736.pdf	Yes	Yes	No
50. SEC v. Donald Blackstad, et al., Case No. 20-cv-163 (Jan. 8, 2020)	Defendant raised approximately \$3.544 million through the fraudulent offer and sale of securities in three companies he owned and controlled, including a purported cryptocurrency mining operation. Defendant made materially false and misleading statements to induce investment and misappropriated	No	No	Yes

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 13 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
	the funds raised through the fraudulent offering and sale of these securities. https://www.sec.gov/litigation/litreleases/2020/lr24711 .htm			
	Defendant charged with conducting fraudulent ICO of digital token using a false identity. https://www.sec.gov/news/press-release/2020-12	Yes	Yes	No
	Defendants charged with fraudulently claiming ICO of unregistered digital tokens was "SEC regulated," "SEC compliant," and "SEC registered," among other deceptive acts. https://www.sec.gov/litigation/litreleases/2020/lr24723.htm		Yes	No
53. SEC v. Ackerman, Case No. 20-cv-1181 (S.D.N.Y. Feb. 11, 2020)	Defendant charged with defrauding investors by making material false and misleading claims about returns they could expect by investing in his business he claimed used a proprietary algorithm to trade cryptocurrencies. https://www.sec.gov/litigation/litreleases/2020/lr24737.htm	No	No	Yes

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 14 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
v	Defendant offered and sold unregistered digital tokens through an ICO. https://www.sec.gov/litigation/admin/2020/33-10755.pdf	Yes	Yes	No
55. In the Matter of Steven Seagal, File No. 3- 19712 (Feb. 27, 2020)	Defendant promoted an ICO without disclosing consideration offered in exchange for promotion, in violation of Section 17(b) of the Securities Act. https://www.sec.gov/news/press-release/2020-42	No	No	Yes
Trust, et al., Case No. 20-cv-273 (W.D. Tex. Mar. 16, 2020)	Defendants offered and sold an unregistered digital token through an ICO. Defendants falsely claimed the digital token was backed by a \$1 billion art collection or \$2 billion of gold, and that an accounting firm was auditing the gold assets. The defendants also made material misrepresentations about the risk and return on the digital token, never distributed the actual token, and used the investor funds for personal expenses. https://www.sec.gov/litigation/litreleases/2020/lr24775		Yes	No
et al., Case No. 20-cv-	.htm Defendants charged with three separate fraudulent and unregistered offerings and sales of securities, including the offer and sale of a digital token defendants falsely claimed was backed by bottled alkaline water. https://www.sec.gov/litigation/litreleases/2020/lr24787.htm	Yes	Yes	No

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 15 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
al., Case No. 20-cv-	Defendants charged with offering and selling unregistered digital tokens through a fraudulent ICO. Defendant diverted investor funds to other projects and personal bank accounts then manufactured fake profitability reports and misrepresented the volume and dollar amount of digital tokens sold during and after the ICO, ultimately claiming it had raised \$54 million from 34,000 investors when it had raised less than \$1.9 million from fewer than 2,500 investors. https://www.sec.gov/litigation/litreleases/2020/lr24804.htm		Yes	No
Case No. 20-cv-0030,		Yes	No	Yes
v	Defendants offered and sold an unregistered digital token through an ICO. https://www.sec.gov/litigation/admin/2020/33-10788.pdf	Yes	Yes	No

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 16 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
1	Defendants fraudulently raised and subsequently misappropriated millions of dollars from the sale of limited partnership interests in a fund they claimed would invest in digital assets. https://www.sec.gov/litigation/complaints/2020/comp-pr2020-137.pdf	No	No	Yes
	Defendant offered and sold unregistered digital tokens through an ICO and made materially false or misleading representations, including falsely claiming that the technology was complete when it was not and that they were on the verge of purchasing an advertising slot during the Super Bowl. https://www.sec.gov/litigation/complaints/2020/comp-pr2020-145-abramoff.pdf	Yes	Yes	No
63. SEC v. NAC Foundation LLC, et al., Case No. 20- cv-04188 (N.D. Cal. June 25, 2020)		Yes	Yes	No
	Defendants, a private company offering financial transactions through contracts memorialized on the Bitcoin blockchain, sold security-based swaps in violation of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. https://www.sec.gov/litigation/admin/2020/33-10801.pdf	No	No	Yes

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 17 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
65. In the Matter of Kevin Boon, LLC, et al., File No. 3-19913 (Aug. 13, 2020)	Defendants offered and sold unregistered digital tokens through an ICO and made material misrepresentations about its platform's technological capabilities. https://www.sec.gov/litigation/admin/2020/33-10817.pdf	Yes	Yes	No
66. SEC v. Millan, et al., Case No. 20-cv-06575 (S.D.N.Y. Aug. 18, 2020)	Defendants acted as unregistered broker-dealers by promoting investment in an MLM scheme, taking investment orders and receiving investor cash. https://www.sec.gov/litigation/litreleases/2020/lr24870.htm	No	No	Yes
	Defendants operated a Ponzi scheme promising investors high rates of returns based on purported expertise in investing in foreign currency exchanges and cryptocurrencies. Defendants fraudulently raised \$27 million from approximately 1,200 investors. https://www.sec.gov/litigation/complaints/2020/comp-pr2020-198.pdf	No	No	Yes
No. 20-cv-03739 (N.D. Ga. Sept. 10, 2020)	Defendants offered and sold unregistered digital tokens through ICOs and made materially false or misleading representations during the course of these offerings. https://www.sec.gov/litigation/complaints/2020/comp-pr2020-207.pdf	Yes	Yes	No

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 18 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
	Arising from the same set of facts as <i>FLiK</i> , defendant offered and sold digital tokens through an ICO. https://www.sec.gov/litigation/admin/2020/33-10836.pdf	Yes	Yes	No
Inc., File No. 3-20003	Defendant offered and sold unregistered digital tokens through an ICO. https://www.sec.gov/litigation/admin/2020/33- 10841.pdf	Yes	Yes	No
71. In the Matter of Salt Blockchain Inc., File No. 3-20106 (Sept. 30, 2020)	Defendant offered and sold unregistered digital tokens through an ICO. https://www.sec.gov/litigation/admin/2020/33-10865.pdf	Yes	Yes	No
al., Case No. 20-cv- 08281 (S.D.N.Y. Oct. 5,	Defendant promoted an ICO without disclosing consideration offered in exchange for promotion, in violation of Section 17(b) of the Securities Act. https://www.sec.gov/litigation/complaints/2020/comp-pr2020-246.pdf	No	No	Yes
Bradley Garlinghouse,	Alleging that Ripple's distributions of XRP constitute investment contracts and thus securities subject to registration under Section 5 of the Securities Act.	Yes	Yes	Yes

Case 1:20-cv-10832-AT-SN Document 423-1 Filed 02/09/22 Page 19 of 19

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
Case No. 20-cv-10849 (S.D.N.Y. Dec. 22,	Defendant made false claims to raise capital for two hedge funds, which he claimed were involved in algorithmic trading of cryptocurrencies. https://www.sec.gov/news/press-release/2020-341	No	No	Yes
Inc., File No. 3-20188	Defendant offered and sold unregistered digital tokens through an ICO. https://www.sec.gov/litigation/admin/2020/33-10914.pdf	Yes	Yes	No